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November 18, 2013

VIA EMAIL

Honorable Richard D. Bennett
UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
101 West Lombard Street, Chambers 5D
Garmatz Federal Courthouse
Baltimore, Maryland 21201

Re: *In Re: Titanium Dioxide Antitrust Litigation*
Case No.: 10-CV-00318 RDB

Dear Judge Bennett:

In connection with the November 25, 2013 final fairness hearing, and as we advised the Court in Plaintiffs' Motion for Final Approval of Class Action Settlements with Defendants E.I. DuPont De Nemours and Company, Cristal USA, Inc., Kronos Worldwide, Inc., and Huntsman International LLC, and Plan of Allocation (ECF No. 545), accompanying this letter is a proposed Order of Final Approval and Judgment. It has been stipulated to by the parties. Should the Court decide to enter it, it should not be entered before December 13, 2013, which is the day after the date upon which the ninety-day notice period expires pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(d).

No objections to the settlements, the requests for attorneys' fees, reimbursement of expenses, and payment of service awards to the class representatives have been received by any party.

With respect to Plaintiffs' request for expense reimbursement set forth in the Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and for Service Awards to the Class Representatives (ECF No. 546), the amount of expenses for which reimbursement has been requested inadvertently omitted a trial-related expense in the amount of \$14,067.20. Thus, the corrected amount of expenses for which Plaintiffs seek reimbursement out of the settlement funds is \$4,569,271.86. This amount remains substantially less than the amount identified in the Notice, which advised Class members that Class Counsel would request up to \$5.5 million for reimbursement of expenses. As noted, no objections to this request have been received.



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Thank you for your attention to these matters.

Respectfully submitted,

/s/ Paul Mark Sandler

PMS/kmm

cc: All counsel of record (*via e-mail*)